

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

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STATE OF RHODE ISLAND; STATE OF  
NEW YORK; STATE OF HAWAI'I; STATE  
OF ARIZONA; STATE OF CALIFORNIA;  
STATE OF COLORADO; STATE OF  
CONNECTICUT; STATE OF DELAWARE;  
STATE OF ILLINOIS; STATE OF MAINE;  
STATE OF MARYLAND;  
COMMONWEALTH OF MASSACHUSETTS;  
PEOPLE OF THE STATE OF MICHIGAN;  
STATE OF MINNESOTA; STATE OF  
NEVADA; STATE OF NEW JERSEY; STATE  
OF NEW MEXICO; STATE OF OREGON;  
STATE OF VERMONT; STATE OF  
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; INSTITUTE OF  
MUSEUM AND LIBRARY SERVICES;  
KEITH E. SONDERLING, in his official  
capacity as Acting Director of the Institute of  
Museum and Library Services; MINORITY  
BUSINESS AND DEVELOPMENT AGENCY;  
MADIHA D. LATIF, in her official capacity as  
Deputy Under Secretary of Commerce for  
Minority Business Development; HOWARD  
LUTNICK, in his official capacity as Secretary  
of Commerce; FEDERAL MEDIATION AND  
CONCILIATION SERVICE; GREG  
GOLDSTEIN, in his official capacity as Acting  
Director of the Federal Mediation and  
Conciliation Service; OFFICE OF  
MANAGEMENT AND BUDGET; RUSSELL  
T. VOUGHT, in his official capacity as Director  
of the Office of Management and Budget;

Defendants.

Case No.: 1:25-cv-128

**NOTICE OF SUPPLEMENTAL FILING**

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On April 17, an individual named Nate Cavanaugh, purporting to act “[u]nder the authority of Keith Sonderling, Acting Undersecretary of MBDA,” sent notices to recipients of MBDA grants informing them that their grants were being terminated effective April 17, 2025. It is our understanding that all preexisting grants were terminated pursuant to such notices, including grants to Plaintiff States. *See* Alex Doe 2nd Supp. Decl., Ex. 55.

Plaintiff States ask the Court to accept the attached as Exhibits 55 through 61 to supplement Plaintiff States’ record in support of their pending motion for a preliminary injunction.

Supplemental declarations are attached for Alex Doe, Exhibit 55; Bon Wikenheiser, Exhibit 56; and Monica Villalobos, Exhibit 57.

Exhibits 58 through 61 are termination notices related to grants described in declarations previously submitted:

- Exhibit 58, MB21OBD8020251 (University of Hawai‘i) (Hokoana Decl. ¶ 8, ECF 03-11)
- Exhibit 59, MB21OBD8050204 (University of Hawai‘i) (Deane Decl. ¶ 13, ECF 03-10)
- Exhibit 60, MB23OBD0340311 (Northern Great Lakes Initiatives) (Sangalli Decl. ¶ 14, ECF 03-20)

- Exhibit 61, MB23OBD0340314 (Hub and Skills for Rhode Island's Future) (Tanner Decl. ¶ 11, ECF 03-29)

April 17, 2025

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I filed the within via the ECF filing system and that a copy is available for viewing and downloading. I have also caused a copy to be sent via the ECF System to counsel of record on this 17th day of April, 2025.

*/s/ Kaliko 'onālani D. Fernandes*